

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

FILED
U.S. BANKRUPTCY COURT, WDNC
JAN 22 2019
Stefani Chalea, Clerk
Charlotte Division/CCH

In Re:

ACE MOTOR ACCEPTANCE
CORPORATION,

Debtor.

Case No: 18-30426
Chapter 11

ACE MOTORS ACCEPTANCE
CORPORATION,

Plaintiff.

Adversary Proceeding No 18-3036

v.

FLASH AUTOS, LLC
ROBERT MCCOY III
MCCOY MOTORS, LLC, MCCOY
MOTORS, LLC d/b/a RIDE FAST;
ROBERT MCCOY JR. and MISTY
MCCOY,

Defendants.

**MOTION FOR ORDER OF DISMISSAL BASED ON DEFENDANT'S JURISDICTION
BEING TOTALLY IN SOUTH CAROLINA. ALSO DEFENDANT NEVER HAD ANY
FINANCIAL OR CONTRACTUAL DEALING WITH THE PLAINTIFF. COURT DATE
TO BE BASED UPON PLAINTIFF'S ORIGINAL MOTION BUT I WOULD OBJECT
TO ANY EMERGENCY MOTION. (RESPONSE TO DOCUMENT 153 OR ANY
RELATED DOCUMENTS)**

1. The defendant FLASH AUTOS, LLC IS A SOUTH CAROLINA Company and believes any litigation should be brought against it in that jurisdiction. Defendant has never had any financial or contractual dealings with Plaintiff and I don't believe any has or will be presented to this court other than non-factual conspiracy theories. Seeing as how the biggest burden is with the Plaintiff I ask this matter be dismissed with prejudice.

~~1163~~
Robert McCoy

2. If this matter moves forward I would ask the court for at least 120 days to gather funds to retain counsel as this matter will put an undue burden on the defendant and it's employee's.

WHEREFORE, the Defendant prays that it be granted the relief set forth herein, together with other such relief as is just under the circumstances.

CERTIFICATE OF SERVICE

This is to certify that I this day served a copy of the attached. **MOTION FOR ORDER OF DISMISSAL BASED ON DEFENDANT'S JURISDICTION BEING TOTALLY IN SOUTH CAROLINA. ALSO DEFENDANT NEVER HAD ANY FINANCIAL OR CONTRACTUAL DEALING WITH THE PLAINTIFF. COURT DATE TO BE BASED UPON PLAINTIFF'S ORIGINAL MOTION BUT I WOULD OBJECT TO ANY EMERGENCY MOTION. (RESPONSE TO DOCUMENT 153 OR ANY RELATED DOCUMENTS)** via Clerk of Court via all parties or their attorney of record requesting notice and via the United States Post Office to the following:

This 22ND day of January, 2019.

LANG LAW FIRM
/s/ Kristin Harmon Lang
Kristin Harmon Lang, Esquire
North Carolina Bar No.: 20539
2439 Plantation Center Drive
Matthews, NC 28105
Phone: 704-907-2203
Fax: 704-847-1452
kharmoulang@gmail.com

THE HENDERSON LAW FIRM
/s/ James H. Henderson
James H. Henderson
State Bar No. 13536
1120 GREENWOOD CLIFF
Charlotte, NC 28204
Phone: 704-333-3444



Fax: 704-333-5003
henderson@title11.com

Respectfully submitted this 22nd day of January, 2019

A handwritten signature in black ink, appearing to read "Robert B. McCoy III", is written over a horizontal line.

FLASH AUTOS, LLC
Registered Agent Robert McCoy III
3606 HWY 51
FORT MILL, SC 29715